

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
RAMON E. SANCHEZ	:	VIOLATIONS:
	:	
	:	18 U.S.C. § 1951 (attempted interference
	:	with interstate commerce by robbery -
	:	1 count)
	:	18 U.S.C. § 924(c) (use of a firearm
	:	during a crime of violence - 1 count)
	:	18 U.S.C. § 922(g)(1) (convicted felon in
	:	possession of a firearm - 1 count)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, the Sunoco A-Plus Market, 624 North Park Road, Wyomissing, Pennsylvania, was engaged in the retail sale of gasoline, food and beverages in interstate commerce and was a business which affected interstate commerce.

2. On or about July 13, 2008, in Wyomissing, in the Eastern District of Pennsylvania, defendant

RAMON E. SANCHEZ

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by attempted robbery, in that, defendant SANCHEZ unlawfully attempted to take and obtain money and other items of value from the person or in the presence of another and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to their person and property, that is, by attempting to enter the Sunoco A-Plus Market wearing a mask and disguise and, when confronted by a patron of that business, producing a loaded pistol and brandishing it at the patron.

In violation of Title 18, United States Code, Sections 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 13, 2008, in Wyomissing, in the Eastern District of Pennsylvania,
defendant

RAMON E. SANCHEZ

knowingly used and carried a firearm, that is, a Glock, Model 26, 9mm pistol, with a defaced serial number, loaded with seven live rounds of ammunition, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, attempted interference with commerce by robbery.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 13, 2008, in Wyomissing, in the Eastern District of Pennsylvania,
defendant

RAMON E. SANCHEZ,

having been convicted in a court of the United States of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, that is, a Glock, Model 26, 9mm pistol, with a defaced serial number, loaded with seven rounds of live ammunition, one in the chamber and six in the magazine.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 922(g)(1) and 924(c), set forth in this indictment, defendant

RAMON E. SANCHEZ

shall forfeit to the United States of America all firearm and ammunition involved in the commission of such offense, including, but not limited to:

- (1) One Glock, Model 26 semiautomatic handgun with a defaced serial number;
and
- (2) Seven live rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

LAURIE MAGID
Acting United States Attorney